

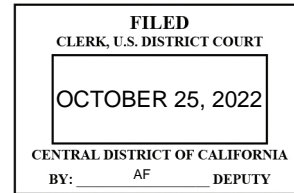
1 **SUSAN SCHOFIELD**

2 25001 Magic Mountain Pkwy. #620

3 Valencia, CA. 91355

4 (661) 857-2120

5 **PLAINTIFF IN PRO PER**



6
7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9

10
11 SUSAN SCHOFIELD, an
12 individual,

13 Plaintiff,

14
15 v.

16 COUNTY OF LOS ANGELES, et al.

17 Defendants.
18
19
20

Case No: 2:22-cv-04332-JGB (AS)

**PLAINTIFF'S CASE MANAGEMENT
REPORT**

Complaint Filed: June 23, 2022

Current response date: Oct. 24, 2022

New response date: Oct. 24, 2022

21
22 TO THE HONORABLE COURT:

23 Pursuant to the Court's order of August 22, 2022, Plaintiff Susan
24 Schofield ("Plaintiff") hereby submits her Case Management Report and
25 other matters specified in the Court's order.

26
27 **A. A brief description of the factual and legal issues raised in this case.**

28 This case is basically a civil rights matter under the 1st and 14th

1 Amendments that involves claims of constitutional violations of the family
2 members' rights of familial association and retaliation by Los Angeles
3 County social workers and Plaintiff's *first* court-appointed lawyer relating
4 to judicial deception and violation of other constitutional rights in securing
5 a court order resulting in the removal of minors and medical examinations
6 of minors without notice to or consent of Plaintiff.

7 8 1. SUBJECT MATTER JURISDICTION.

9 The Court has subject matter jurisdiction based on Plaintiff's claim
10 under 42 U.S.C. section 1983.

11 12 2. LEGAL ISSUES.

13 (a) Whether Defendants violated 42 U.S.C. section 1983 by
14 interfering with the family relationship of Plaintiff, and by
15 deceptively presenting fabricated evidence in order to force the
16 removal of J.S. and B.S. from Plaintiff.

17 (b) Whether Defendants violated 42 U.S.C. section 1983 by
18 retaliating against Plaintiff for questioning and/or protesting
19 government action.

20
21 B. A statement of the parties' discovery plans, including the completion of
22 discovery to date, anticipated discovery to be conducted before the cut-
23 off date, and any disputes / motions likely to be presented to the Court.

24 25 1. WRITTEN DISCOVERY SOUGHT; DATES DUE.

26 No such written discovery has gone out due to this waiting for the
27 Superior Court to act on the Plaintiffs' W&IC 827 submitted September
28 12th, 2022.

1
2 **2. DISCOVERY SUBJECTS**

3 Plaintiff will conduct discovery relating to the removal of minors
4 J.S. and B.S. from their mother's custody, including the basis for removal
5 and any related investigations. Plaintiff will also conduct discovery on all
6 retaliation against Plaintiff that caused the removal.
7

8 **3. PROPOSED TIMING OF DISCLOSURES; EXPERTS**

9 Premature, however Plaintiff has no objection to exchanging initial
10 Rule 26 disclosures 14 days after Scheduling Conference. Plaintiff will make
11 initial disclosures at such time as the Court may set, if that 14 days post
12 the Scheduling Conference appears unnecessary or will simply cause the
13 duplication of effort without the juvenile case file available for use in this
14 matter.
15

16 **4. CHANGES TO DISCOVERY**

17 Plaintiff does not anticipate requiring any changes to discovery
18 rules or any issues with disclosure or preservation of evidence.
19

20 **C. A description of any motions that the parties anticipate filing. If the**
21 **defense does not intend to file a case dispositive motion, this information**
22 **will be included.**
23

24 Plaintiff anticipates filing a Motion for Summary Adjudication on
25 issues of liability for retaliation, medical examinations, and removal of the
26 children.
27

28 Plaintiff intends to bring a motion for partial summary judgment or

1 adjudication of any of Defendants' affirmative defenses which ultimately
2 are unsupported by the evidence obtained during discovery.

3 4 **1. DECLARATORY & INJUNCTIVE RELIEF**

5 Declaratory & Injunctive Relief as further elaborated under
6 Plaintiff's Seventh Cause of Action.

7 8 **2. PROTECTIVE ORDER**

9 Since this case involves the conduct of social workers, it is
10 anticipated that protective orders will be requested in connection with
11 their individual records as well as records maintained by their employers.

12 13 **D. The number of witnesses anticipated to testify at trial, and the nature** 14 **of any expert witness testimony.**

15 Plaintiff anticipates the calling of the following witnesses, among
16 others: (1) Plaintiff; (2) the various social workers that participated in this
17 action; (3) all attorneys that represented Plaintiff in the juvenile case; (4)
18 Plaintiff's ex-husband (Michael Schofield); (5) Plaintiff's husband (Cory
19 Cabana); (6) any witnesses in this legal action; (7) all treating physicians of
20 the children; (8) an expert witness on the evaluation of Plaintiff's mental
21 health determinations; (9) Los Angeles County officials familiar with the
22 County of Los Angeles Department of Children and Family Services policy
23 and practices; and (10) other parents who have suffered similar removals
24 of child(ren) as a result of judicial deception through a protective custody
25 warrant. The specific identity of these witnesses (and potentially the need
26 for further witnesses) may be revealed via additional discovery.

1
2 E. The parties' time estimate for trial, and whether the matter will be a jury
3 or bench trial.

4 Plaintiff included a Demand for Jury Trial in her Complaint filed
5 June 23, 2022.

6
7 **1. PROPOSED PRE-TRIAL CONFERENCE DATE.**

8 Unable to propose such a date under the circumstances.
9

10 F. An explanation of the likelihood of settlement, and a statement of
11 anticipated settlement or mediation methods to be used before trial.

12
13 **1. MEDIATION METHODS**

14 Plaintiff is agreeable to either a Panel mediator or magistrate. As
15 to timing, it should occur after the parties have access to the juvenile case
16 files.

17
18 **2. SETTLEMENT PROSPECTS**

19 Plaintiff submits settlement discussions would be premature at
20 any time prior to release of the juvenile case file for use in this litigation,
21 and, until depositions of the named individual Defendants have occurred.
22 Plaintiff will accept any decision of the Court to the contrary, but believes
23 even a discussion of the topic is premature at this point.
24

25 G. Any other information that the parties deem important to bring to the
26 Court's attention.

27
28 **1. RELATED CASE**

1 Plaintiff's daughter, J.S., filed a civil rights suit against similar
2 defendants on August 7, 2022 (Case No. 2:22-cv-05590-JGB (AS)). However,
3 J.S.'s lawsuit emphasizes the severe mental and physical trauma she
4 suffered while under the care, custody, and control of said Defendants.
5

6 2. IMMINENT RISK

7 B.S. is still under the care, custody, and control of the Los Angeles
8 County Department of Children and Family Services and is ongoing and
9 likely to continue suffering detrimental danger of child abuse and neglect
10 while remaining under their care, custody, and control.
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SUSAN SCHOFIELD

PRO SE LITIGANT

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18 **DATED:** OCTOBER 24, 2022



SUSAN SCHOFIELD

PRO SE LITIGANT
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